

## Office of the Chapter 13 Standing Trustee

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February 27, 2020

The Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court  
P.O. Box 2067  
Camden, New Jersey 08102

**RE: Chapter 13 Bankruptcy**  
**Case No. 17-35439 (ABA)**  
**Debtor(s) Name: Thomas J. Cocuzza, Sr.**

Dear Judge Altenburg:

Please accept this letter in lieu of a more formal response to Debtor's Motion to Approve Sale of Real Estate on shortened time which is returnable March 3, 2020 at 11:00 a.m.

Debtor comes before the Court twenty-six (26) months after his Chapter 13 Bankruptcy Petition was filed on a Motion to Approve Sale of his residence located at 1007 Chateau Court, Atco, New Jersey. Debtor has executed a Contract of Sale for \$142,500. On February 27, 2018, Select Portfolio Servicing, Inc. filed a secured proof of claim in the amount of \$505,972.34 (Claim No. 6.) There is no evidence that Select Portfolio Servicing, Inc. and Debtor have entered into a Short Sale Agreement.

While the Trustee does not oppose the sale of Debtor's property, the Trustee respectfully requests that Debtor be required to submit an amended proposed Order to the Judge's chambers to include the following language:

Within fourteen (14) days of the date of this Order, the Debtor shall:

1. Provide evidence of a short sale agreement with Select Portfolio Servicing, Inc.; and
2. File an Amended Schedule J

As always, the Court is welcome to contact the Trustee with any concerns.

Respectfully submitted,

*/s/ Jane L. McDonald*  
Jane L. McDonald  
Counsel

JLM/jpa  
cc: Jenkins & Clayman (Via CM/ECF)  
Thomas J. Cocuzza, Sr. (Via First Class Mail)